COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Boston Edison Company, Cambridge Electric Light Company, Commonwealth Electric Company, d/b/a NSTAR Electric	)	**D.T.E. 03-121**

ATTORNEY GENERAL'S THIRD SET OF DOCUMENT AND INFORMATION REQUESTS TO NSTAR ELECTRIC

AG-3-1 What is Dr. Parmesano's opinion of metering requirements for standby rates? Should there be mandatory metering of all use, demand and energy (including self supplied)? Should metering requirements be the same for all DG customers or only certain classes or customers with certain demand levels or other characteristics? If only for certain customers, please explain the rationale for the differentiation. Should all metering be time of use?

AG-3-2 Please discuss Dr. Parmesano's position regarding how standby energy should be priced. Should it be priced differently than that provided to customers with the same load characteristics but who do not self generate.

AG-3-3 Is Dr. Parmesano familiar with the Companies continuing recovery of stranded costs in the form of "above market payments to independent power producers"? If yes, does Dr. Parmesano believe that customers that install DG should be allowed to shift part of the responsibility for these costs, as represented by the new self-supplied load, to the non-DG customers?

AG-3-4 Refer to Exhibit NSTAR-CPS-1. Please define and explain how "diversity" is calculated at each of the levels discussed by Mr. Salamone-- distribution circuit level, substation level and transmission levels.

AG-3-5 Refer to Exhibit NSTAR-CPS-1, page 11. What is MIT's peak demand (combined self generation served and distribution served). According to the response to AG-1-19, MIT's contract demand is 19.5 MW. How was that determined? Provide all supporting data, calculations, assumptions and narrative explaining how the determination was made. If the contract demand level has changed over time, provide the history of the changes and explain why each change was made.

AG-3-6 Refer to Exhibit NSTAR-CPS-1, page 11. What is the peak demand served by the Putnam St. Substation for each year since the MIT generating unit came on line? What has been MIT's peak load for each of those years? Please note the MIT demand relates to load served by the generating unit either fully or partially.

AG-3-7 Refer to Exhibit NSTAR-CPS-1, page 11. Does MIT export any power from its generator? If yes, what have been the kWh exports for each year since the unit came on line? Is this power purchased by Cambridge Electric or by NSTAR? Is the power transported on Cambridge Electric distribution system? Is the power transported on the Cambridge Electric transmission system? Does Cambridge Electric provide reactive power to MIT? If yes, provide the terms and conditions of these transactions, including the pricing provisions. Is MIT a Standard Offer, Default Service or competitively supplied energy customer?

AG-3-8 Refer to Exhibit NSTAR-CPS-1, page 6. Are all NSTAR transformers capable of carrying "their normal load and some or all of the load normally carried" by a failed unit? What is the average excess capacity of transformers on each of the Companies' distribution systems that allows for this flexibility? Here excess means the amount of transformer capacity above the amount needed to serve normal load.

AG-3-9 Refer to Exhibit NSTAR-HCL-7, page 29. Please provide all analyses, studies, calculations and assumptions supporting the Companies' decision to submit new standby tariffs that "reflect an as used demand charge for standby service for customers having DG units" because that recognizes the load diversity at the substation level. If no NSTAR specific studies, analyses or data were relied upon, please explain how the material and documents used have been shown to be representative of each of the Companies' systems.

AG-3-10 Refer to Exhibit NSTAR-HCL-10, Boston Edison Company, M.D.T.E. No. 138 (new), Availability section and M.D.T.E. No. 136A (new). Please explain why the SB-1 tariff was modified to eliminate G-3 customers. Please note that the Rate Per Month--Supplemental Delivery Service section, page 3 of the tariff, continues to refer to the G-3 customers in the "Determination of Kilowatt Demand for billing"sub-section.

AG-3-11 Refer to Exhibits NSTAR-HCL-7, page 29 and HCL-10. Regarding the changes made to the proposed tariffs to reflect diversity at the substation level, please provide all analyses, studies, calculations and assumptions that Mr. LaMontagne relied on to develop the "cut off" parameters of 1000 kW(Boston Edison T-2, G-3 customers with DG) and 10 kW(Boston Edison G-2 customers with DG) and the equivalent changes for Cambridge and Commonwealth for the new standby tariffs. If the 10 kW modification is not related to the Companies desire to reflect diversity at the substation level, please provide the basis (all analyses, studies, calculations and assumptions) and explanation the purpose of this modification.

AG-3-12 Refer to Exhibit NSTAR-HCL-9 and 10. Please explain how Mr. LaMontagne developed the new rates for standby demand using the data in Exhibit NSTAR-HCL-9. Include all supporting documentation, analyses, calculations and assumptions that validate the use of the Companies total gross plant allocators. What other methods did the Companies consider in designing the new rates to reflect their concept of diversity? Explain why the alternative methods were rejected.

AG-3-13 Please explain how the Cambridge Electric's back-up, standby and maintenance rates currently in place were originally developed and how they have changed since rates were unbundled. If these rates were developed as part of a settlement, please discuss the issues that were addressed by the settling parties and provide a copy of the settlement and the Department's order approving the settlement.